

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

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**IN RE: BLUE CROSS BLUE SHIELD  
ANTITRUST LITIGATION  
(MDL No. 2406)**

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) This Document relates to Provider  
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**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT ON PROVIDERS'  
DAMAGES CLAIMS AS TIME-BARRED AND SPECULATIVE**

Defendants hereby move, pursuant to Federal Rule of Civil Procedure 56, for an order granting summary judgment for Defendants on all of Provider Plaintiffs' damages claims arising under Section 4 of the Clayton Act. For the reasons set forth in Defendants' accompanying Memorandum in Support of Motion for Summary Judgment on Providers' Damages Claims as Time-Barred and Speculative, Defendants respectfully request that the Court grant their Motion in its entirety and enter judgment in Defendants' favor on all of the aforementioned claims.

Dated: June 21, 2021

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 21, 2021, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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